

Note: This Regional Oversight Plan Template is recommended but not required. Required information regardless of format: 1) state; 2) program; 3) significant issues; 4) corrective measures/escalation approach being taken by region/state; including schedule and timeframes for completion of corrective actions.

**National Strategy Regional Oversight Plan
Region 1
March 2016**

STATE	PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
All States	All Media	<p><u>SRF Data</u> Region 1 completed its Round 3 SRF report for Maine, for FY13, in November 2015 and for Massachusetts for FY15 in December 2015. For both reviews, and consistent with previous reviews, the most prevalent and significant issues revolve around data issues. Incomplete data, inaccurate data, the timeliness of data entry were all identified as issues in both SRF reviews. None of the issues are insurmountable nor are they unique to these states. Data issues cut across all media programs and all states.</p>	For issues that are identified in each SRF review, including data issues, the Region has a process to conduct quarterly check-in discussions with each state to track the progress on correcting any identified issues. Some issues may take several quarters or years to resolve. Regardless, quarterly check-ins will serve to keep issues identified in each SRF at the forefront. This is a Tier 1 issue (i.e., staff level discussions are on-going).
All States	CAA	<p><u>ICIS-Air</u> Region 1 states made the transition from AFS to ICIS-Air in FY15 with significant resources and effort from Region 1 air enforcement staff.</p> <p>Continued assistance to our states is expected to continue in FY16 and FY17 to review and correct data inconsistency and provide training and assistance to the states.</p> <p>Region 1 is concerned about the validity and usability of ICIS-Air data for SRF reviews. In FY16, we are scheduled to review New Hampshire's FY15 performance.</p>	<p>Region 1 anticipates that the resource burden on EPA staff will lessen over time as the transition to ICIS-Air concludes; however, significant effort is expected throughout FY17. Continued OECA technical and contract resources to supporting the transition is critical to ensure a smooth transition. This is a Tier 1 issue (i.e., staff level discussions are on-going).</p> <p>OECA guidance acknowledging and clarifying how the FY15 ICIS-Air data will be used and interpreted for SRF reviews would be beneficial.</p>

STATE	PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
RI, CT, VT and ME	CWA	<p>The Clean Water Act Electronic Reporting Rule will require states to:</p> <ul style="list-style-type: none"> • Modify permits to require electronic reporting; • Get CROMMER approval for any state electronic reporting systems; • Implement electronic reporting for all traditional permits; • Implement electronic applications and electronic reporting for general permits; • Report all state inspections and enforcement activity to ICIS-NPDES; and • Require sewer overflow notices to be submitted to the state electronically. • Report facility and permit information (per Appendix A to eRule) for all state permits that require DMRs. <p>Significant resources are being expended by Region 1's water enforcement staff to educate, train and oversee our states' implementation of the NPDES E-reporting rule. Aggressive targets for implementation are required under the rule, and whether or not our states will meet those goals remains to be seen.</p>	<p>Significant training and technical assistance has been required as the rule has been implemented. Region 1 expects to support these efforts, but this does take resources away from other work. With two direct implementation states, the diversion of any resources to support this rule is not without consequences. This is a Tier 1 issue (i.e., staff level discussions are on-going).</p> <p>Continued technical and contractor support from OECA is critical to the successful implementation of the NPDES E-reporting rule.</p>
All States	All Media	<p><u>State Resources</u></p> <p>Region 1 states have suffered from the loss of key enforcement staff in recent years. They continue to be able to meet minimum program requirements, but they rely on Region 1 in some important program areas. For example, Region 1 has been assisting RIDEM's CAA enforcement program by providing observers for some air emission compliance tests and CTDEEP has raised the possibility of returning the asbestos NESHAP program to EPA.</p> <p>The issue of the need for additional state enforcement resources has been noted in recent SRF reports for RI, ME and MA. Of particular concern are organizational changes in MEDEP. MEDEP's RCRA and water enforcement units have been split and/or reassigned recently, and the loss of 3 CAA inspectors recently impacts their ability to meet inspection commitments moving forward. This coupled with MEDEP's questioning of EPA's actions and role on several recent enforcement matters has raised concerns in Region 1. For now, we are monitoring the situation as it evolves.</p>	<p>To date, our states have continued to meet their minimum enforcement commitments to EPA; however, any further loss of key enforcement staff could be serious depending on the state and the specific media program. If a critical state capacity concern arises, we would elevate this to senior regional management for discussion at a state commissioner level. This is currently a Tier 1 issue (i.e., staff level discussions are on-going).</p>